

SHERRI L. SCHWEITZER, COUNTY COUNSEL  
BY: WILLIAM H. KENNEY, ASSISTANT COUNTY COUNSEL  
ATTORNEY ID#: 9179  
520 MARKET STREET – 14<sup>TH</sup> FLOOR COURTHOUSE  
CAMDEN, NEW JERSEY 08102-1375  
(856) 225-5543

ATTORNEYS FOR DEFENDANT, COUNTY OF CAMDEN AND CAMDEN COUNTY SHERIFF'S DEPARTMENT

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

GLENN KINGSBURY, Individually and in :  
in his capacity as Executor of the ESTATE CIVIL ACTION  
OF JOHN KINGSBURY, deceased :  
vs.

*Plaintiff(s)* : CIVIL ACTION NO. 1:13-cv-07912

CAMDEN COUNTY SHERIFF'S :  
DEPARTMENT; CAMDEN COUNTY;  
LAUREN KOHL; MICHAEL CASTRO; :  
JOHN DOES 1-5; individually and/or in  
their official capacities, jointly, severally :  
and in the alternative : AFFIDAVIT OF KEVIN CUNANE, SERGEANT

*Defendant(s)* :

---

Kevin Cunane, of full age, being duly sworn upon his oath, deposes and says:

1. I am a Sergeant in the Camden County Sheriff's Office and have been assigned to Internal Affairs since May 25, 2009.
2. In my capacity in IA, I am familiar with the allegations in both the civil action captioned above and the criminal matter styled State v. Castro in Atlantic County.
3. Sheriff's Officers, including Lauren Kohl, a defendant in this matter, are issued service weapons, and records of issue and use are kept by the Department.
4. Lauren Kohl was issued a Sig Sauer, Model P220, .45 caliber with serial No. G323388 on November 3, 2010.
5. Lauren Kohl turned this weapon in for a new service weapon on August 14, 2013.

6. Our own internal affairs investigation showed that Plaintiff's decedent was killed with a .38 caliber weapon – later identified by ballistics testing as a Ruger LCP .380 caliber handgun owned by Lauren Kohl.
7. The Sheriff's Department has never issued a .380 caliber weapon to Lauren Kohl.
8. The identified .380 caliber Ruger has never been in the possession, custody or control of the Camden County Sheriff's Department.
9. As part of our Internal Affairs investigation, we received and reviewed the Winslow Township Police Department investigative report showing Defendant Kohl reported two personal weapons either lost or stolen on February 19, 2012. That two-page report is attached as Exhibit 1.

*Sgt. J. Cunane*

KEVIN CUNANE, SERGEANT  
Camden County Sheriff's Office

Sworn and subscribed to  
Before me this 17 day of  
February, 2014.

*Joann Beebe*

*Notary Public  
State of New Jersey  
Joann Beebe  
My Commission Expires April 26, 2014*

INVESTIGATIVE REPORT						
1. Complaint Number 2012-008549	2. Mun. Code NJ0043600	Phone Number (809) 551-3300	4. UCR 20:20-3	21. Prosecutor's Case Num. LAUREN KOHL	22. Criminal Case Number	
5. Crime/Incident THEFT / LARCENY		6. NJS 20:20-3			23. Victim's Name (First, Middle, Last) LAUREN KOHL	
					Social Security Number 156-80-0368	24. D.O.B. 02/20/1978
DATE AND TIME	7. Between <input checked="" type="checkbox"/> 20:00	8. Hour Sat	9. Day Dec	10. Mo. 24	11. Date 11	12. Yr.
		07:00	Mon	Feb	13	12
13. Crime/Incident Location 5 OAK FOREST DRIVE NJ				28. Employer CAMDEN COUNTY SHERIFF'S D		
14. Municipality WINSLOW TWP		15. County CAMDEN	16. Code. 0436	29. Person Reporting Crime/Incident LAUREN KOHL		
17. Type of Premises SINGLE FAMIL		18. Code 21	19. Weapons - Tools UNKNOWN	20. Code UNK	30. Date and Time 2/19/2012 14:36	
31. Address 5 OAK FOREST DRIVE SICKLERVILLE NJ 08081. (856) 875-7480						
32. Modus Operandi THE COMPLAINANT IS REPORTING TWO FIRE ARMS MISSING FROM HER RESIDENCE. IT IS UNKNOWN IF THEY ARE LOST OR STOLEN.						
33. Vehicle	34. Year	35. Make	36. Body Type	37. Color	38. Registered Number & State	39. Serial Number or Identification
VALUE STOLEN PROPERTY	40. Currency	41. Jewelry	42. Furs	43. Clothing	44. Auto	45. Misc. \$955.00
46. Total Value Stolen \$955.00	47. Total Value Recovered	48. S.C.I.C. #	49. Computer Msg.	50. Technician - Agency		
51. QLN #	52. LIS	53. N.G.L.C. # G232631303	57-62. Evidence Found			
54-55. Witness						
List Accused, List and Identify Additional Victims; Describe Perpetrators or Suspects; Action Taken Include Findings and Observations of Investigator; Physical Evidence Found; Where By Whom; Disposition and Technical Services Performed; Interview of Victims; Persons Contacted; Accused Suspects' List; Describe Stolen Property; Value; Court Action; Attached Statements.						
56. No. of Accused 0	57. Adult 0	58. Juvenile 0	59. Status Crime ACTIVE	60. Status Case INVEST	61. UCR Status Month Yr.	62. Date Cleared
70. Name			Address		71. Age	72. Sex
					73. Race	74. DOB
[FIREARM] ONE RUGER LCP .380 HANDGUN SERIAL NUMBER 37201647 NCIC#G232631303						
[FIREARM] ONE KAHR .40 STAINLESS HANDGUN SERIAL NUMBER DF1806 NCIC#G582634371						
ON 02/19/2012 AT 1436 HRS I WAS DISPATCHED TO 5 OAK FOREST DRIVE FOR A LOST OR POSSIBLY STOLEN FIREARMS REPORT. UPON ARRIVAL, I MET WITH LAUREN KOHL WHO WAS STANDING IN FRONT OF THE RESIDENCE. KOHL REPORTED THE FOLLOWING INFORMATION TO ME:						
KOHL FIRST STATED TO ME THAT SHE IS EMPLOYED BY THE CAMDEN COUNTY SHERIFF DEPARTMENT AS A SHERIFF OFFICER. KOHL STATED SHE NOTICED THAT TWO OF HER OFF DUTY FIREARMS ARE MISSING. SHE DID NOT OBSERVE ANY FORCED ENTRY AND DID NOT FEEL LIKE THERE WAS A BURGLARY AT HER RESIDENCE. THE FOLLOWING IS THE REPORTED TIME LINE FOR THIS INCIDENT:						
-12/24/2011 KOHL WAS READING INTO THE CITY OF PHILADELPHIA AND CARRIED HER RUGER LCP .380 HANDGUN.						
75. Name PTLM JAMES HAINES			76. Badge Number 206	77. Page 1 of 2 Pages	78. Date of Report Feb 21, 2012	79. Reviewed By LTR OSTERMUELL
Signature _____			80.	81.	82.	

WINSLOW TWP POLICE DEPT

CONTINUATION PAGE

1. Complaint Number 2012-008549	21. Prosecutor's Case Number	22. Criminal Case Number		
WIFE HER. WHEN SEE RETURNED HOME SEE THINKS SEE PLACED THE GUN BACK IN HER SAFE BUT WAS NOT SURE.				
-01/01/2012 TO 01/15/2012 KOHL WAS ON VACATION AND NO ONE WAS TO BE AT HER RESIDENCE.				
-02/13/2012 KOHL WAS TO REPORT TO THE RANGE FOR QUALIFICATION. KOHL ATTEMPTED TO LOCATE HER OFF DUTY WEAPONS AND NOTICED THAT THE ABOVE LISTED WEAPONS WERE MISSING. KOHL BRIEFLY SEARCHED FOR THEM AND WHEN SEE COULDN'T FIND THEM SEE TOOK A DIFFERENT OFF DUTY (A TAURUS .40) TO THE RANGE TO QUALIFY. AFTER THE RANGE, SEE CONTINUED TO LOOK FOR THE MISSING GUNS.				
-02/15/2012 KOHL NOTICED THAT HER REAR SLIDING DOOR WAS UNLOCKED BUT NOT OPEN. KOHL FELT THIS WAS ODD BECAUSE SEE NEVER USES THIS DOOR. KOHL STATED THAT THE DOOR COULD HAVE BEEN UNLOCKED FOR SOME TIME BECAUSE SEE NEVER USES THAT DOOR. KOHL CALLS OUT OF WORK CONTINUE TO LOOK FOR THE WEAPONS NOW WITH THE ASSISTANCE OF HER MOTHER.				
-02/16/2012 KOHL IS UPSET ABOUT THE WEAPONS BEING MISSING AND CALLS OUT OF WORK.				
-02/19/2012 AT APPROXIMATELY 1400 HRS KOHL CONTACTS HER INTERNAL AFFAIRS DEPT AT WORK TO ADVISE THEM SEE IS MISSING TWO WEAPONS. INTERNAL AFFAIRS TAKES THE REPORT AND ADVISES HER TO CONTACT WINSLOW POLICE.				
I ASKED KOHL WHERE THE GUNS WERE SPECIFICALLY LOCATED IN THE RESIDENCE AND SEE ADVISED SHE IS NOT SURE. SEE WEAPONS WERE IN THE SAFE AT ONE POINT BUT WERE REMOVED BECAUSE HER MOTHER WANTED TO LOOK AT JEWELRY IN THE SAFE AND IS AFRAID OF GUNS. THE GUNS WERE PLACED UNDER HER NIGHT STAND AT THAT POINT. KOHL ADVISED ME SEE LIVES ALONE AND HAS GUNS IN SEVERAL PLACES THROUGH OUT THE RESIDENCE. THIS IS WHY KOHL TOOK SO LONG TO REPORT THE GUNS MISSING. I ASKED ABOUT THE POSSIBILITY OF A BURGLARY AND SEE STATED THAT SOMEONE COULD HAVE ENTERED THE RESIDENCE THROUGH THE UNLOCKED REAR DOOR AND REMOVE THE TWO GUNS. THE GUNS WERE MOST LIKELY IN HER BEDROOM AND THERE WERE NO OTHER ITEMS MISSING FROM THE RESIDENCE. THERE ARE THREE OTHER GUNS INSIDE OF THE RESIDENCE ONE WHICH WAS NOT SECURED IN A SAFE IN HER BEDROOM. KOHL ALSO STATED SEE HAS A MEDIUM SIZED DOG THAT BARKS AT SUBJECTS WHO COME NEAR THE RESIDENCE. KOHL STATED THAT HER MOTHER AND A CO WORKER FROM THE SHERIFF DEPT ARE THE ONLY PEOPLE WITH KEYS TO THE RESIDENCE. KOHL DOES NOT HAVE ANY SUSPECTS IN MIND THAT WOULD HAVE POSSIBLY ENTERED THE RESIDENCE AND REMOVE THE GUNS. I PROVIDED KOHL WITH A COPY OF THE CASE NUMBER AND MY INFORMATION. KOHL SIGNED THE NCIC ENTRY PAPERWORK FOR THE FIREARMS AND I CLEARED THE SCENE.				
I RESPONDED TO POLICE HEADQUARTERS TO ENTER THE GUNS INTO NCIC AS STOLEN. THE GUNS WERE ENTERED (SEE ATTACHED NCIC PAPERWORK). THIS CASE IS PENDING FURTHER INVESTIGATION.				
75. Name PTLM JAMES HAINES Signature _____	76. Badge Number 206	77. Page 2 of 2 Pages 80.	78. Date of Report Feb 21, 2012 81.	79. Reviewed By LTR OSTERMUELL 82.